

FILED

FEB 21 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

)

Plaintiff,

)

v.

) No.

ADAM K. WIEGAND &
KEVIN W. WIEGAND

)

Defendants.

)

4:19CR00155 RWS/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning and ending at a time unknown, but up to and including October 2017, in St. Charles County and within the Eastern District of Missouri and elsewhere,

**ADAM K. WIEGAND and
KEVIN W. WIEGAND,**

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree with one or more other persons known and unknown to the Grand Jury, to commit offenses against the United States, to wit: to possess with intent to distribute a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 846.

The quantity of mixture or substance containing a detectable amount of LSD involved in the conspiracy and attributable to the defendants as a result of their own conduct, and the conduct of other conspirators, known or reasonably foreseeable to the defendants, is 10 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(v).

COUNT II

The Grand Jury further charges that:

On or about October 19, 2017, in St. Charles County and within the Eastern District of Missouri,

**ADAM K. WIEGAND and
KEVIN W. WIEGAND,**

the defendants herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

The quantity of mixture or substance containing a detectable amount of LSD for which the defendants are accountable based upon their own conduct is 10 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(v).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Counts I and II, the defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Counts I and II.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

a. Approximately \$37,220.00 U.S. Currency.

4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

GEOFFREY S. OGDEN, #66930MO
Special Assistant United States Attorney